

BASINGSTOKE & DEANE LOCAL PLAN EXAMINATION ISSUE 4: OTHER HOUSING MATTERS

6.1 Is the overall level of housing provision deliverable, especially in relation to viability?

We have raised some questions about the ability for all areas of the district to sustain a rate of 40% affordable housing in combination with S106 and CIL rates. We have addressed this in Matter 3 and our original statements.

The implications of requiring developments to comply with technical standards Part M4 (2) and Part M4 (3) will also have a serious effect on viability. This matter needs to be clarified.

Paragraph 4.9 of the Local Plan states that the housing requirement (now 850 dpa) reflects the degree of the water capacity and treatment facilities available within the borough. This is not a legitimate argument to set a housing requirement that is lower than the OAN (the HBF contends that the OAN is greater than 850 dpa). Paragraph ID 2a-004 of the NPPG describes that constraints should not be applied to the assessment of housing need. The existence of constraints, such as environmental ones, may, however, be a material consideration in establishing the local plan housing requirement.

Whether water supply and treatment is a legitimate constraint on the delivery of the full OAN is arguable. We refer to our original representations of October 2013. Furthermore Policy EM6 – Water Quality – requires applicants in sensitive areas to assess the effect of development on water quality and pollution. Policy EM9 – Sustainable Water Use – sets a tighter water efficiency standard (policy EM9 will need to be amended to bring it into line with the updated technical standards). These policies therefore should mitigate the effect of development thereby removing the justification for setting a housing requirement that is lower than the OAN. So long as developments individually appraise their impact on the water resource there is no justification that accords with national policy to set a requirement that is lower than the OAN.

6.2 In all other respects, are there reasonable prospects that an appropriate range of housing by size and type will be delivered through the implementation of the Local Plan, including policy CN3?

We refer to our representations of October 2013. We consider that the policy is overly prescriptive but also too vague in terms of what might constitute an acceptable application. It gives too much power to the decision-taker to interpret what might be required. It requires too much work from the applicant to justify the house types in the application. This is counter to the spirit of paragraph 14 of the NPPF (approving development proposals that accord with the development plan without delay) and paragraph 17 of the NPPF which states that local plans should provide a practical framework within which decisions can be made with a high degree of predictability and efficiency.

Part (d) of the policy requires new housing to be “*adaptable housing to enable people to stay in their homes as their needs change*”. Paragraph 5.26 provides further explanation as to what this might mean. Firstly, the policy is unclear as to what is being required. If the policy is requiring compliance with a certain building standard/regulation then it needs to be explicit about which standard/regulation this is and say this in the policy.

Secondly, the Council will be aware that the Lifetime Homes has been removed as a development standard following the Government’s Housing Standards Review. The Council should clarify whether it is its intention to seek compliance with optional technical standards Part 4M (2) (accessible and adaptable dwellings) and/or Part 4M (3) (wheelchair user dwellings). If the Council does wish to adopt both or either of these technical standards then the Council will need to satisfy the tests set out the NPPG (Housing – Optional Technical Standards). It will need to meet these tests before it can adopt these standards in its local plan.

The Council will need to clearly state what proportion of dwellings should comply with the requirements (NPPG ID 56-008). Furthermore, the optional standard for wheelchair accessible homes (Part M4 (3)) should be applied only to the affordable housing element (NPPG ID 56-009).

We note paragraph 5.23 and its reference to self-build opportunities. The Council should articulate in the plan more precisely what it intends to require in respect. If, however, this is to be a discretionary matter for the applicant then the local plan should make this clear.

James Stevens, MRTPI
Strategic Planner

Email: james.stevens@hbf.co.uk

Tel: 0207 960 1623